

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KIMBERLY HUDSON-BRYANT,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

ONDERLAW, LLC

Defendant.

Case No. 4:25-cv-0244-HEA

PARTIES' JOINT PROPOSED SCHEDULING PLAN

- a. The parties agree that assignment to the Standard track is appropriate.
- b. The parties propose August 7, 2025 as a deadline to join additional parties or amend pleadings.
- c. The parties agree on the following discovery plan:
 - i. The Parties expect that some discovery will be in electronic form and intend to stipulate or agree to the form or forms in which electronic discovery should be produced or otherwise made available. The parties have requested that production of electronic documents be made in a searchable format and that the production of any records of telemarketing calls be produced in their native format. To the extent any issues regarding the format for electronic discovery arise, the Parties will confer in good faith before bringing them to the attention of the Court.
 - ii. The parties will seek entry of a protective order, as the defenses in this matter, as well as, in some respects, the claims, relate to marketing and calls made in the context of an attorney-client relationship, including, with respect to the calls at issue, calls to a reassigned number that was a former client of the Defendant. The parties will work in good faith to address claims of privilege as they arise, including entry of a Rule 502 Order.
 - iii. The Parties have agreed on May 8, 2025 for initial disclosures.
 - iv. Discovery should not be conducted in phases or limited to certain issues.
 - v. The Parties shall designate their experts and provide initial expert reports by December 5. Simultaneous disclosure will be appropriate in this case. Expert depositions to conclude by January 12, 2026.
 - vi. There should be no variance to the presumptive limits of the federal rules.
 - vii. No physical or mental examinations will be required.
 - viii. Discovery to conclude by January 12, 2026.
 - ix. There are no other pertinent matters at this time.
- d. The Plaintiff has tendered an individual settlement offer but not received a response. To the extent that a mediation, either before a private mediator or magistrate, would be helpful in coming to a resolution, the parties are not opposed.
- e. Motions to dismiss, motions for judgment on the pleadings, motions for summary judgment, and motions for class certification, due on or before February 16, 2026.

- f. The earliest date the case will be ready for trial is after summary judgment and class certification are fully briefed and decided, which will be in mid-March to early April of 2026.
- g. The parties estimate the case will take 3-4 days to try to verdict.
- h. There are no other matters for inclusion in the Joint Scheduling Plan at this time.

RESPECTFULLY SUBMITTED AND DATED this May 2, 2025.

s/Andrew Roman Perrong
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ONDERLAW, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2025, a copy of the foregoing was served electronically
via CM/ECF:

/s/ Martin L. Daesch